

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, *et al.*,

Plaintiffs,

v.

AMERICAN AIRLINES GROUP INC.
and
JETBLUE AIRWAYS CORPORATION,

Defendants.

Case No.: 1:21-cv-11558-LTS

**NON-PARTIES GLEN HAUENSTEIN, JOSEPH ESPOSITO, AND
DELTA AIR LINES INC.'S MOTION TO QUASH TRIAL
SUBPOENAS TO GLEN HAUENSTEIN AND JOSEPH ESPOSITO**

Pursuant to Rule 45 of the Federal Rules of Civil Procedure, Non-Parties Glen Hauenstein, Joseph Esposito, and Delta Air Lines, Inc. (“Delta”) respectfully move this Court to quash the trial subpoenas to Mr. Hauenstein and Mr. Esposito because there is no “cause” under 15 U.S.C. § 23 to compel their appearance at trial in Boston and doing so would impose an undue burden.

In support of this motion, Mr. Hauenstein, Mr. Esposito, and Delta submit an accompany Memorandum of Law, the Declaration of Michael S. Mitchell and accompanying four exhibits, the Declaration of Glen Hauenstein, and the Declaration of Joseph Esposito. Mr. Hauenstein, Mr. Esposito, and Delta will further submit any additional briefing and argument permitted or requested by the Court.

Dated: September 21, 2022

Respectfully submitted,

/s/ Michael S. Mitchell

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LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), I hereby certify that Non-Parties Delta, Mr. Hauenstein, and Mr. Esposito met and conferred in good faith with counsel for the Defendants regarding the relief requested in this motion, as described in the Declaration of Michael S. Mitchell. Defendants have filed a motion to compel and confirm they oppose this motion.

/s/ Michael S. Mitchell

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CERTIFICATE OF SERVICE

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: September 21, 2022

/s/ Michael S. Mitchell

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